

**REMARKS**

At the outset, Applicants thank the Examiner for the thorough review and consideration of the subject application. The Office Action of April 7, 2005 has been received and its contents thoroughly reviewed.

In the Office Action, the Examiner rejected claims 1-5, 7-15, and 17-22 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Ahan (UK Patent App. Pub. No. GB 2 325 329 A) in view of Silverstein et al. (U.S. Patent No. 4,800,375). This rejection is respectfully traversed and reconsideration is requested.

Preliminarily, Applicants note claims 21 and 22 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Ahan in view of Silverstein et al. However, claims 21 and 22 do not exist. Accordingly, and for purposes of prosecution, Applicants hereby assume the Examiner intended to reject only claims 1-20.

Rejecting claims 1 and 11, the Examiner acknowledges that Ahan fails to teach “providing color data signals having a same color to the data lines by the demultiplexer unit before applying a different color.” Attempting to cure this deficiency, the Examiner relies upon Silverstein et al. as allegedly disclosing “where color data signals having a same color are consecutively provided to the data lines before applying a different color” and that the system of Silverstein et al. “is advantageous as it combats insufficient pixel density and asymmetrical angular resolution such as image coarseness and color ‘fringing or aliasing’ and reduces the number of scanning lines, thus reducing power consumption and expense.” Finally, the Examiner concludes that it would have been obvious to “incorporate the feature of Silverstein et al into that of Ahan as they teach a method of driving flat panel type color matrix displays in which a discretely addressable matrix of red, green and blue (RGB) picture elements are used to

generate full color images.” Applicants, however, respectfully disagree with respect to both the Examiner’s interpretation of Silverstein et al. and with the asserted motivation to combine Ahan and Silverstein et al.

Specifically, Silverstein et al. fails to teach or suggest wherein “color data signals having a same color are consecutively provided to the data lines before applying a different color,” as asserted by the Examiner. For example, at column 2, line 64 - column 3, line 12, Silverstein et al. discloses:

FIGS. 2a, 2b, 2c, and 2d illustrate four color pixel arrangements which are known to be either under investigation or implemented for color matrix displays. FIG. 2a shows an R-G-B arrangement with a diagonal orientation of color primaries. FIG. 2b shows an R-G-B arrangement in which the primary color pixels are packed in triads. This has an offset structure, reminiscent of color triad arrangements commonly used on delta gun shadow-mask color cathode ray tubes. FIG. 2c depicts an R-G-B pattern with a vertical stripe orientation of color primaries. This pattern is reminiscent of in-line gun shadow mask color cathode ray tubes. FIG. 2d shows a four-element R-G-B-G pattern. The only known prior patent for a 4-pixel arrangement of primary color elements is for an R-G-B-G pattern used to produce a color filter array for sensor elements of a charge coupled device color video camera.

In view of the above, Applicants respectfully submit that Silverstein et al., even when considered in its entirety, simply fails to teach wherein “color data signals having a same color are consecutively provided to the data lines before applying a different color,” as asserted by the Examiner. For at least this reason, Applicants submit that neither Ahan nor Silverstein et al., singly or in combination, teach or suggest each and every element recited in either of claims 1 or 11 and, therefore, request withdrawal of the present rejection of claims 1 and 11, and claims 2-5, 7-10, 12-15, and 17-22 which variously depend therefrom, under 35 U.S.C. § 103(a).

Even if Silverstein et al. taught what it is asserted as teaching, Applicants respectfully submit that the applied rationale to combine Ahan and Silverstein et al. (i.e., because the references “teach a method of driving flat panel type color matrix displays in which a discretely

addressable matrix of red, green and blue (RGB) picture elements are used to generate full color images”) fails to identify any rationale that would lead one of ordinary skill in the art to reasonably expect their combination to arrive at the inventions recited in claims 1 or 11. That both Ahan and Silverstein et al. allegedly “teach a method of driving flat panel ... displays in which a discretely addressable matrix of red, green and blue (RGB) picture elements ... to generate full color images” merely identifies that Ahan and Silverstein et al. are analogous to each other. While analogousness between references is necessary to establish obviousness under 35 U.S.C. § 103(a), there must also be: 1) some suggestion or motivation to modify the reference or combine reference teachings; 2) a reasonable expectation of success; and 3) a complete arrival of the claimed elements within the reference(s) when modified or combined. (See M.P.E.P. § 2143) Thus, Applicants respectfully submit that the Examiner has merely identified analogousness between Ahan and Silverstein et al. and not the obviousness of claims 1 and 11 in light of their combination. Consequently, and for at least this additional reason, Applicants respectfully request withdrawal of the present rejection of claims 1 and 11, and claims 2-5, 7-10, 12-15, and 17-22 which variously depend therefrom, under 35 U.S.C. § 103(a).

In the Office Action, the Examiner rejected claims 6 and 16 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Ahan in view of Silverstein et al. and further in view of Hiroki (U.S. Patent No. 6,628,253). This rejection is respectfully traversed and reconsideration is requested.

Claims 6 and 16 depend from claims 1 and 11, respectively, and therefore include each and every element recited therein. As discussed above, claims 1 and 11 are patentable over Ahan in view of Silverstein et al. The Examiner asserts that Hiroki teaches the elements recited in claims 6 and 16. Without reaching the merits of this assertion, Applicants respectfully submit

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that Hiroki fails to cure the deficiency of Ahan in view of Silverstein et al. as applied to claims 1 and 11. Therefore, Applicants submit that claims 6 and 16 are patentable over Ahan in view of Silverstein et al. and further in view of Hiroki by virtue of their respective dependence from claims 1 and 11 and request withdrawal of the present rejection under 35 U.S.C. § 103(a).


Applicants believe the foregoing remarks place the application in condition for allowance and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Respectfully submitted,

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